

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

FILED IN COURT
ASHEVILLE, NC

APR 03 2019

U.S. DISTRICT COURT
W. DISTRICT OF N.C.

) DOCKET NO. 1:19CR35
)
UNITED STATES OF AMERICA)
)
v.) BILL OF INDICTMENT
)
SAMMY HORACE WILLIAMS, II)
)
)
)
)

Violations:
18 U.S.C. § 2252A(a)(2)(A)
18 U.S.C. § 2252A(a)(5)(B)

THE GRAND JURY CHARGES:

COUNT ONE

From between on or about February 2, 2017 through on or about February 8, 2017, in Buncombe County, within the Western District of North Carolina and elsewhere,

SAMMY HORACE WILLIAMS, II

knowingly distributed and attempted to distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been mailed, using any means and facility of interstate and foreign commerce, and that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT TWO

Beginning on a date unknown to the Grand Jury, continuing through on or about May 17, 2017, in Buncombe County, within the Western District of North Carolina and elsewhere,

SAMMY HORACE WILLIAMS, II

knowingly received, using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, any child pornography, as defined in Title 18 United States Code Section 2256(8)(A).

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT THREE

Beginning on a date unknown to the Grand Jury, continuing through on or about May 17, 2017, in Buncombe County, within the Western District of North Carolina and elsewhere,

SAMMY HORACE WILLIAMS, II

knowingly possessed and accessed with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF FORFEITURE

Notice is hereby given of 18 U.S.C. § 2253 and 21 U.S.C. § 853. The following property is subject to forfeiture in accordance with 18 U.S.C. § 2253 and 21 U.S.C. § 853:

- a. Any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such depiction, which was produced, transported, mailed, shipped, or received during the violations set forth in this bill of indictment;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from proceeds of the violations;
- c. Any property, real or personal, used or intended to be used to commit or promote the violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b) and (c).

The Grand Jury finds probable cause that the following property is subject to forfeiture on one or more of the grounds stated above:

1. Compaq Presario 2200 Laptop SN: CNF6071CSS
2. Dell Laptop -LCT87555562691
3. Five thumb drives.
4. Various CDs and DVDs.

A TRUSTED

GRAND JURY FOREPERSON

R. ANDREW MURRAY
UNITED STATES ATTORNEY


DAVID A. THORNELOE
ASSISTANT UNITED STATES ATTORNEY